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9 UNITED STATES DISTRICT COURT FOR THE
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,)	CR. No. S 00-0161 MCE
)	
12 Plaintiff,)	UNOPPOSED MOTION FOR ORDER
)	EXTENDING TIME FOR
13 V.)	DEFENDANT'S SELF SURRENDER;
)	PROPOSED ORDER
14)	
15 ALFREDO TOBAR, JR.,)	
)	
16 Defendants.)	

17 The United States hereby requests that the defendant's date of self-surrender to commence
18 serving his sentence from August 2, 2005, until noon on October 4, 2005. The reason for the request
19 is that government counsel has been informed by Contra Costa County Deputy District Attorney
20 Patrick Vanier that defendant Tobar is needed for a state court trial which is scheduled to commence
21 in mid-September and should be finished before the end of the month. That trial had previously been
22 scheduled for this month (July) but has been continued. I have contacted the U.S. Bureau of Prisons
23 about the feasibility of bringing the defendant back for the trial and have been informed that the
24 difficulties and costs involved in bringing the defendant back and forth from his designated institution
25 in-custody to attend the state court proceedings, are substantial and costly. Given the relatively short
26 sentence received by the defendant, it is preferable to simply continue his self-surrender date rather
27 than to attempted to move him back and forth from state custody.

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1 I have contacted the attorney for defendant Tobar, Timothy Zindel, Esq., and neither he nor
2 his client has an objection to the government's request.


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4 DATED: July 29, 2005

5 McGREGOR W. SCOTT
6 United States Attorney

7 By: /s/
8 RICHARD J. BENDER
9 Assistant U.S. Attorney

10 O R D E R

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12 It is so ORDERED, this 29th day of July, 2005.

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15 MORRISON C. ENGLAND, JR.
16 UNITED STATES DISTRICT JUDGE
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